

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

Case #: 20-41511-ESS

SUZIE F BLACKSTOCK

CHAPTER13
NOTICE OF MOTION

Debtor

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SIRS:

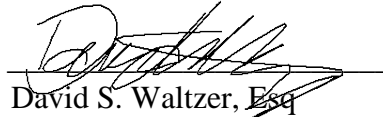
PLEASE TAKE NOTICE, that upon the annexed application of the debtor,

SUZIE F BLACKSTOCK, by her attorney, David S. Waltzer, dated March 27th, 2020 , the undersigned will appear before this Court on May 26th, 2020 at 9:30AM, or as soon thereafter as counsel may be heard, to move before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, in the Courtroom at 271-C Cadman Plaza East, Room 3585 – 3rd Floor, Brooklyn, NY, for an Order, pursuant to Section 362(c)(3)(B) of the United States Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that responsive papers, if any, are to be served on the undersigned and filed with the Court no less than three (3) days prior to the return date of this motion.

Dated: March 27th, 2020
Westchester, New York

Respectfully,



David S. Waltzer, Esq
Attorney at Law

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

Case #: 20-41511-ESS

SUZIE F BLACKSTOCK

Attorney Affirmation in Support of
Motion to Extend Stay

Debtor

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STATE OF NEW YORK

COUNTY OF KINGS

DAVID S. WALTZER, an attorney duly admitted to practice before this Court states:

1. I am the attorney of record for the above captioned debtor.
2. This affirmation is submitted in support of the application by the debtor for the entry of an Order, pursuant to 11 U.S.C. Sections 105 and 362(c)(3)(B) to continue the full force and effect of the automatic stay.
3. This is the debtor's second Chapter 13 filing within the last twelve (12) months. The debtor filed her last case on June 20th, 2019 (Case No. 19-43806-ess).
4. The debtor filed her prior Chapter 13 pro-se and was unable manage the document production or other filing obligations.
5. That case was dismissed without prejudice on December 5, 2019.
6. Subsequently, in 2019 the Debtor's income restored to an amount sufficient for a good faith Chapter 13 bankruptcy.

7. The Debtor also engaged present counsel and is now able to meet the administrative burdens of the present case.

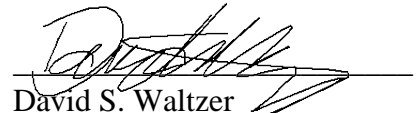
8. The present case is filed in good faith and does not prejudice the creditors.

9. Based upon the foregoing, it is respectfully requested that the automatic stay be continued so that the debtors be permitted the opportunity to continue to prosecute the instant Chapter 13 case with loss mitigation.

10. No prior application has been made by the debtors for the specific relief sought herein.

WHEREFORE, the debtors respectfully requests that an Order be entered, pursuant to 11 U.S.C. Section 362(c)(3)(B), continuing the full force and effect of the automatic stay as to all creditors during the prosecution of this Chapter 13 case, and that the debtors be granted such other and further relief as this Court deems just and proper.

Dated: March 27th, 2020
Westchester, New York


David S. Waltzer
Attorney for the Debtor
One Central Ave Suite 307
Tarrytown, NY 10591
914-287-0880 x210
waltzer@waltzerlawgroup.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

Case #: 20-41511-ESS

SUZIE F BLACKSTOCK

DEBTOR'S AFFIDAVIT OF
CHANGE IN CIRCUMSTANCES

Debtor

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STATE OF NEW YORK

COUNTY OF KINGS

SUZIE F BLACKSTOCK, being duly sworn, does hereby depose and say that:

1. I am the Debtor in the instant case and I am making this affidavit in support of this Court's acceptance of my Chapter 13 Petition. I submit this affidavit in support of my motion for an order pursuant to § 362(c)(3) extending the Automatic Stay against all creditors beyond the thirty (30) day period in this proceeding.
2. This affirmation is submitted in support of the application for the entry of an Order, pursuant to 11 U.S.C. Sections 105 and 362(c)(3)(B) to continue the full force and effect of the automatic stay.
3. I previously filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code on June 20, 2019 (Case No. 19-43806). The prior case was dismissed by Order of this Court on August 5th, 2019.
4. I had filed that case on my own and did not have assistance from family or an attorney.
5. I am now making more money and I am able to afford the mortgage payments.


6. I also have an attorney now.
7. This bankruptcy is filed in good faith and I plan to satisfy all requirements and get a confirmed bankruptcy.
8. I respectfully request that the Automatic Stay pursuant to 11 U.S.C. §362 be extended against all my creditors during the pendency of this new bankruptcy proceeding which has been filed.

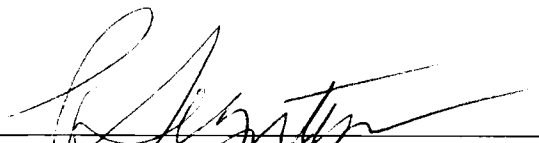
WHEREFORE, in view of the foregoing, it is respectfully requested that this Honorable Court enter an Order pursuant to 11 U.S.C. §362(c)(3) extending the Automatic Stay against all creditors and for such other and further relief as this Court may deem just and proper.

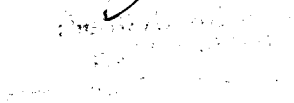
Dated: March 26, 2020

, New York

Sworn before me this 26th day of March 2020


Suzie F Blackstock


Notary Public, State of New York



GA PA

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

Case #: 20-41511-ESS

SUZIE F BLACKSTOCK

CERTIFICATE OF SERVICE

Debtor

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I certify that on the date shown below I mailed a copy of the Notice of Motion to Extend the Automatic Stay, Affirmation in Support, and Affidavit of Change in Circumstances to the parties listed below.

Marianne DeRosa, Office of the Ch 13 Trustee, 100 Jericho Quadrangle, Ste. 127, Jericho, NY 11753

Adam E. Mikolay P.C., 90 Merrick Avenue, Suite 501, East Meadow, NY 11554

AJ Partners LLC ATTN: LOAN OFFICER, 307 E. 91st Street, Ste. 1E, New York, NY, 10128

Joel E Abramson – Referee, 271 Madison Ave, 22nd Floor, New York, NY 10016

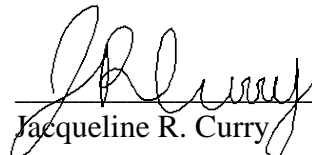
Lawrence & Walsh P.C., ATTN: Eric P. Warner, Esq., 215 Hilton Avenue, PO Box 1200 Hempstead, NY 11550

Sky High Realty, LLC, ATTN: Officer, 248-14 Van Zandt Avenue, Little Neck, NY 11362

Annexed list of creditors and other parties in interest

at the address(es) designated by said attorney and party for that purpose by depositing a true copy of same to each attorney and party, enclosed in a postpaid properly addressed wrapper, VIA first class mail in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Dated: March 27th, 2020
Ulster, New York


Jacqueline R. Curry

Label Matrix for local noticing 0207-1 Case 1-20-41511-ess Eastern District of New York Brooklyn Thu Mar 26 17:12:55 EDT 2020	A-Team Properties, LLC 19 Edwin Street Staten Island, NY 10312-4920	271-C Cadman Plaza East, Suite 1595 Brooklyn, NY 11201-1800
A-Team Properties LLC ATTN: OFFICER 19 Edwin Street Staten Island, NY 10312-4920	A-Team Properties, LLC c/o Lawrence and Walsh, P.C. 215 Hilton Avenue Post Office Box 1200 Hempstead, New York 11551-1200	AJ Partners LLC ATTN: LOAN OFFICER 307 E. 91st Street Ste. 1E New York, NY 10128-6017
AT&T ATTN: Karen A Cavagnaro One AT&T Way Suite 3A104 Bedminster, NJ 07921-2694	AT&T c/o Bankruptcy 4331 Communications Dr Flr 4W Dallas, TX 75211-1300	Adam E. Mikolay P.C. 90 Merrick Avenue Suite 501 East Meadow, NY 11554-1500
American InfoSource LP RE Capital One Bank USA N PO BOX 71083 Charlotte, NC 28272-1083	American InfoSource LP RE T-Mobile 4515 N Santa Fe Ave. Oklahoma City, OK 73118-7901	Capital One Bank 7933 Preston Road Mail Code 31063-1111 Plano, TX 75024-2302
Capital One Bank (USA), N.A. by American InfoSource as agent PO Box 71083 Charlotte, NC 28272-1083	Joel E Abramson - Referee 271 Madison Ave 22nd Floor New York, NY 10016-1001	Lawrence & Walsh P.C. ATTN: Eric P. Warner, Esq 215 Hilton Avenue PO Box 1200 Hempstead, NY 11551-1200
NYC Water Board Andrew Rettig Esq 59-17 Junction Boulevard Elmhurst, NY 11373-5188	Office of the United States Trustee Eastern District of NY (Brooklyn Office) U.S. Federal Office Building 201 Varick Street, Suite 1006 New York, NY 10014-4811	PE-NC LLC ATTN: LOAN OFFICER 595 Stewart Avenue Suite 550 Garden City, NY 11530-4736
Sky High Realty, LLC ATTN: OFFICER 241 W Bankhead Hwy Villa Rica, GA 30180-1813	Sky High Realty, LLC ATTN: Officer 248-14 Van Zandt Avenue Little Neck, NY 11362-1241	(p)T MOBILE C O AMERICAN INFOSOURCE LP 4515 N SANTA FE AVE OKLAHOMA CITY OK 73118-7901
David S Waltzer Law Offices of David S. Waltzer, PC 1 Central Avenue Suite 307 Tarrytown, NY 10591-3301	Marianne DeRosa Office of the Chapter 13 Trustee 100 Jericho Quadrangle Ste 127 Jericho, NY 11753-2702	Suzie F Blackstock 1246 New York Avenue Brooklyn, NY 11203-5508

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

T-Mobile Bankruptcy Team PO Box 53410 Bellevue, WA 98015-3410	(d)T-Mobile USA, Inc. Bankruptcy 5421 Jefferson Street NE Albuquerque, NM 87109-3406	End of Label Matrix Mailable recipients 23 Bypassed recipients 0 Total 23
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